

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

In the matter of the failure of Everglow	)	Docket No. 21-CONS-3118-CPEN
Energy, LLC (Operator) to comply with	)	
K.A.R. 82-3-111 at the E I Belt #1 and E I	)	CONSERVATION DIVISION
Belt #2 in Morris County, Kansas	)	
_____	)	License No.: 35495

**REQUEST FOR HEARING**

COMES NOW, Everglow Energy, LLC, by and through counsel and pursuant to K.S.A. § 55-164, § 77-512 and § 77-513 *et seq.*, and hereby requests a hearing before the Commission on the denial of its application for Temporary Abandonment (TA) and the Penalty Order filed herein.

By letters dated October 20, 2020, the Commission notified Everglow Energy, LLC that its applications for TA for the E I Belt #1 Well (API #15-127-00193-00-00) and the E I Belt #2 Well (API #15-127-20404-00-00) were denied. On December 8, 2020, a Penalty Order issued stating the Wells were not in compliance.

Everglow Energy, LLC requests a hearing to address the Commission's concerns, obtain additional time to comply with the Commission's Rules and Orders due to the current circumstances brought on by the pandemic and obtain the approval of its applications for TA.

WHEREFORE, Everglow Energy, LLC hereby requests a hearing on the denial of its applications for Temporary Abandonment and the Penalty Order issued herein.

Respectfully submitted,



Karl F. Hirsch, KSCT NO. 23274  
*HIRSCH, HEATH & WHITE, PLLC*  
901 Cedar Lake Boulevard  
Oklahoma City, Oklahoma 73114  
Telephone: (405) 235-1768  
Facsimile: (405) 608-4913  
[khirsch@hhwlawfirm.com](mailto:khirsch@hhwlawfirm.com)  
**Attorneys for Everglow Energy, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above and foregoing was served by U.S. Mail, on the following counsel of record, this 5<sup>TH</sup> day of January, 2021.

Kelcey Marsh  
Conservation Division  
Kansas Corporation Commission  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513



KARL F. HIRSCH